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UNITED STATES OF AMERICA
9

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 EASTERN DIVISION

13 IN THE MATTER OF THE
EXTRADITION OF

14 BRYANT RIVERA,
15 aka "Eduardo,"

16 A Fugitive from the
Government of the United
17 Mexican States.

No. 2:23-mj-03275

STIPULATION TO (1) SCHEDULE THE
EXTRADITION HEARING AND
BRIEFING, (2) ALLOW THE FILING OF
OVER LENGTH BRIEFS, (3) ALLOW
THE UNITED STATES TO FILE A
REDACTED VERSION OF THE
EXTRADITION REQUEST
ELECTRONICALLY; AND (4) TAKE THE
STATUS CONFERENCE OFF CALENDAR;
[Proposed] ORDER

20
21 Plaintiff, United States of America, by and through its counsel
22 of record, the United States Attorney and Assistant United States
23 Attorney John J. Lulejian, and relator BRYANT RIVERA, also known as
24 "Eduardo," by and through his counsel of record, Deputy Federal
25 Public Defender J. Alejandro Barrientos, respectfully request this
26 Court to schedule the extradition hearing for February 11, 2023, at
27 11:00 a.m. The parties further request this Court to set the
28 briefing schedule as follows:

1 1. The United States must lodge under seal the original
2 Request for Extradition, bearing ribbons and seals, and file a
3 redacted version of that document on or before September 28, 2023;

4 2. The United States must file its Memorandum in Support of
5 the Request for Extradition on or before October 19, 2023;

6 3. Relator must file his Opposition to the Request for
7 Extradition on or before December 21, 2023; and

8 4. The United States must file its Reply Memorandum in Support
9 of the Extradition Request on or before January 25, 2024.

10 5. The parties also respectfully request that the Court,
11 pursuant to Local Rule 11-6, grant them leave to file over-length
12 memoranda, not to exceed 10,000 words, in support of or in opposition
13 to the Extradition Request.

14 6. The parties further respectfully request that the Court
15 grant the United States leave to file a redacted version of the
16 Extradition Request to CM/ECF without first having to comply with the
17 requirements of Local Rule 79-5.2.2.

18 7. The parties also respectfully request that the Court take
19 the Status Conference scheduled for September 20, 2023, at 11:00 a.m.
20 off calendar.

21 8. The parties have met and conferred and believe that the
22 proposed dates will allow for the prompt resolution of this
23 extradition matter. Further, they recognize that given the size of
24 the Extradition Request and the nature of the crimes alleged by
25 Mexico in that request, a thorough briefing of the issues before the
26 Court will require them to file briefs in excess of 7,000 words, as
27 required by Local Rule 11.6-1. Finally, the parties have discussed
28 redactions to the Extradition Request and agree that personal

1 identifying information and the graphic photographs of the evidence
2 must be redacted. The parties further agree that allowing the
3 United States to file the Redacted Extradition Request directly to
4 CM/ECF, without first having to comply with the procedures set forth
5 in Local Rule 79-5.2.2, will make the lengthy document available to
6 the public quickly and avoid taxing the limited resources of the
7 Court.

8 IT IS SO STIPULATED.

9
10 September 19, 2023
Date

/s/ John J. Lulejian

JOHN J. LULEJIAN
Assistant United States Attorney
Attorney for Plaintiff
UNITED STATES OF AMERICA

13
14 September 19, 2023
Date

/s/ J. Alejandro Barrientos
(authorized by telephone)

J. ALEJANDRO BARRIENTOS
Deputy Federal Public Defender
Attorney for Relator
BRYANT RIVERA